

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
CIVIL DIVISION**

F09070009

LPP Mortgage LTD.

Plaintiff,

-vs.-

Rodolfo Magana;

Sofia Esquivel;

Defendant.

Case No.: 1:10-cv-00169

Hon. Judge Charles R. Norgle

MOTION FOR ENTRY OF CONSENT JUDGMENT OF FORECLOSURE

NOW COMES Plaintiff, LPP Mortgage LTD., by and through its attorneys, Freedman Anselmo Lindberg LLC, and moves this Court, pursuant to and in accordance with the Stipulation for entry of a Consent Judgment of Foreclosure and Sale, containing, among other things, a finding of the waiver of the right of redemption in this cause, and a waiver of any and all rights to a personal judgment for deficiency against the Defendant-mortgagor and against all other persons liable for the indebtedness or other obligations secured by the trust deed, and in support thereof, states:

1. Plaintiff has offered to waive any right to a personal deficiency judgment against the Defendants and all others obligated under the mortgage in exchange for a consent foreclosure. Defendants Rodolfo Magana and Sofia Esquivel have agreed to the entry of a Consent Judgment of Foreclosure.

2. Pursuant to 735 ILCS 5/15-1402, Plaintiff waives any and all rights to a personal judgment for deficiency against Defendant(s), Rodolfo Magana and Sofia Esquivel , and against all other persons liable for the indebtedness.

WHEREFORE, the Plaintiff, LPP Mortgage LTD, requests that this Court enter a Consent Judgment of Foreclosure, containing, among other things, a finding of the waiver of the right of redemption in this cause and for any further relief this Court deems equitable and just.

/s/ Steven C. Lindberg
Attorney for Plaintiff

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